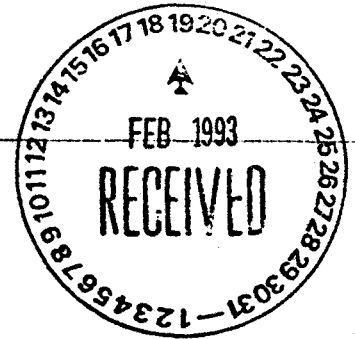


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INTEROFFICE CORRESPONDENCE

DATE: February 17, 1993

TO: Distribution
LDM

FROM: L.D. McManus, RCRA Regulatory Programs, Bldg. T130C, X2135

SUBJECT: PLANTWIDE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) CLOSURE PROGRAM - LDM-002-93

The purpose of this letter is to inform you of the development of plantwide RCRA Closure Program for the Rocky Flats Plant (RFP). RCRA Regulatory Programs is most anxious to receive any comments or suggestions you may have on this Program.

RFP REGULATORY CLOSURE OBLIGATIONS

Under RCRA and the Colorado Hazardous Waste Act (CHWA), a hazardous waste management unit must be closed at the end of its active life. Closure involves removing hazardous waste and materials from the unit; and decontaminating the unit and all associated equipment in a manner which minimizes the need for further maintenance, and controls, minimizes or eliminates, to the extent necessary, to protect human health and the environment post-closure escape of hazardous waste and hazardous constituents.

BACKGROUND - CLOSURES AT RFP

Every closure at RFP is unique. Some are complex and involve shutting down a hazardous waste management unit, consisting of hundreds of different components (tanks, pipes, ancillary equipment), other closures are relatively simple and, for example, involve merely decontaminating one unit (such as a small storage area).

Not only is each closure at RFP unique but closures frequently will involve problems which defy easy resolution - identifying contaminants, determining whether the proposed activity actually constitutes closure or something less than closure which will not trigger closure obligations, selecting the appropriate sampling and analysis method.

PROBLEMS

Currently, there is no overall approach to RCRA closures at RFP. Every closure is treated as an isolated, unrelated event and consequently, problems solved in connection with one closure must often be addressed in a subsequent closure. Additionally, failure to have a plantwide approach to closure with which the Colorado Department of Health (CDH) has concurred, forces

ADMIN RECORD

A-SW-000816

REVIEWED FOR CLASSIFICATION/UCNI

By *B.M. Hoffman* u/n

Date *8-25-93*

RFP to renegotiate closure issues considered by RFP to have been previously resolved. This results in unnecessary duplication of effort, is costly and, RCRA Regulatory Programs is concerned that inconsistencies will result.

DEVELOPMENT OF A PLANTWIDE RCRA CLOSURE PROGRAM

The RCRA Regulatory Programs group recognized the pitfalls of managing closures on an ad hoc basis and has concluded that a plantwide, integrated approach to closure was imperative to achieving efficient and cost effective closures.

RCRA Regulatory Programs is now attempting to coordinate the various RFP closures through a plantwide closure program and is in the process of developing a formal closure program which will replace the current fragmented approach with a coordinated plan.

A plantwide closure program will be an important step toward promoting RFP compliance with the RCRA closure obligations and ensuring sound management of an activity which will entail significant expenditure.

RCRA Regulatory Programs will develop the Closure Program over a nine month period, as shown in Attachment A. However, during the development of the Closure Program, RCRA Regulatory Programs will continue to offer guidance and support to all RFP RCRA closure activities.

IMPLEMENTATION OF CLOSURE PROGRAM

The Closure Program will be implemented through a Closure Policy, the Hazardous Waste Requirements Manual and a RFP Closure Strategy.

Closure Policy

The Closure Policy will define the mission of the RFP Closure Program and formally state the Program's goals and objectives.

The Hazardous Waste Requirements Manual (Chapter 15 - Closures)

The Hazardous Waste Requirements Manual (HWRM) establishes the requirements for hazardous and mixed waste activities at the RFP. Chapter 15 - Closures will summarize the duties and responsibilities of groups having primary responsibility for closures.

Closure Strategy

The Closure Strategy is a management plan that will constitute the framework for the RFP Closure Program. The Strategy is intended to assist those groups having direct responsibility for closures.

The Strategy will:

- set forth the regulatory obligations which govern RCRA closures;
- begin with an assessment of commitments for units currently undergoing closure and units at which closures are planned;
- address each major step of the closure process from the initiation of closure through any post-closure obligations;
- identify critical issues and potential roadblocks to closures which must be addressed prior to initiating the closure process;
- provide criteria to assist the Buildings in their evaluation and selection of closure options and sampling and analysis methods;
- set forth parameters against which the Closure Program can be monitored and evaluated;
- clarify complex closure problems through the periodic issuance of Closure Guidance. Each Guidance will identify a subject matter expert who can be contacted for additional information and guidance on that issue.

The implementation and ultimate success of RFP's Closure Program requires the input and involvement of the groups having primary responsibility for RCRA closure activities (Building Operations and Engineering) in the development of the Program. RCRA Regulatory Programs will provide these groups with opportunity to input to the development of the program and welcomes their suggestions.

As closure activities proceed, the Program will be periodically reevaluated to determine whether modifications or additional actions are needed. Again Building Operations and Engineering will be invited to participate in this evaluation and revision process.

LDM:aaf

Attachment:
As Stated

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